

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Warren Steel Holdings - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #7
Progress Report
Warren Steel Holdings
C5AV
Warren, OH
Latitude: 41.2629796 Longitude: -80.7990185

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From: Stephen Wolfe, OSC

Date: 7/13/2018

Reporting Period: 06/11/2018 through 07/13/2018

1. Introduction

1.1 Background

Site Number:	C5AV	Contract Number:	
D.O. Number:		Action Memo Date:	2/20/2018
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	4/24/2018	Start Date:	4/24/2018
Demob Date:		Completion Date:	
CERCLIS ID:	OH0011207	RCRIS ID:	OHD066060608
ERNS No.:		State Notification:	yes
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time Critical Removal Action

NOTE: POLREPS 1 and 2 were for emergency response actions (initial and final) that occurred 04/27/17 through 6/02/2017

1.1.2 Site Description

WSH is a former 400-acre steel manufacturing facility. The site was in operation from at least the 1940s, and all operations official ceased at the facility in January 2016. EPA is gathering all drums and containers of hazardous waste that was abandoned at the facility as well as inspecting approximately 100 transformers for possible pcb oil/threat to waterway.

1.1.2.1 Location

4000 Mahoning Street, Warren, Ohio.

1.1.2.2 Description of Threat

EPA and Ohio EPA documented abandoned drums/totes/other containers containing hazardous waste (corrosives, pcb oil, used oil) at the site. EPA performed a site assessment on April 27, 2017 and documented that some of the material had a pH of 1-2 standard units and 14 standard units. A sample of oil from a pit on the site tested positive for pcbs at 90 ppm. Labeling is present on the majority of the containers indicating sulfuric acid, caustics, and water treatment chemicals.

Approximately 100 transformers are present on site, half of which are located near the bank of the Mahoning River. No data is available on whether or not the transformers contain oil/pcb oil. EPA will

investigate the transformers as part of the Removal Action and handle appropriately.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Information from Ohio EPA and the EPA site assessment indicated the presence of caustic material (acid and bases) as well as used, oil, and pcb contaminated oil. The EPA site assessment noted the presence of possible asbestos containing materials; however, asbestos removal is not a part of this removal action. EPA will address any loose asbestos if the material inhibits the ability to gather the containers of hazardous waste.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

This is a Time Critical Removal Action focusing on the removal of drums and other containers of hazardous waste. Electrical Transformers will also be inspected to determine if they are full of oil/pcb oil.

2.1.2 Response Actions to Date

During the week of June 11, 2018, ERRS and their subcontractor sampled all the electrical transformers on site for oil content and pcb analysis. An independent electrical subcontractor was also on site to provide expertise in ensuring all electrical equipment was de-energized prior to sampling. Preliminary results were received on July 3, 2018 indicated that all but 11 of the transformers (126 investigated) were non-pcb. Final results were received on July 11th and appropriate disposal samples were made and delivered to a laboratory for disposal analysis.

An OPA 90 Project Plan under FPN E18519 was submitted to the US Coast Guard National Pollution Fund Center requesting funding to drain the approximately 75 transformers, one 10,000 gallon tank, and 200 capacitors located on the banks of the Mahoning River. Upon USCG approval of the plan, the oil will be drained to remove the threat of release to the Mahoning River. All work related to the OPA funding will be discussed under a separate POLREP.

From Monday, July 9, 2018 through Friday July 13th, ERRS prepared wastes for disposal. Activities consisted of overpacking non-DOT shippable drums, bulking materials, and overpacking loose smaller containers.

During bulking of hydrochloric acid (HCL), START performed air monitoring and levels exceeded the instruments detection limit (20 ppm). Since Level C respiratory protection is adequate for up to 20 ppm, activities were halted. HCL bulking operations were moved from inside a building to outside to provide better ventilation and air monitoring consistently stayed below 10 ppm. throughout the completion of the bulking.

On Friday, July 13th, 2018 a local company picked up 15 supersacks (approximately 22 tons) of their material from the site and transported them to another steel production facility for re-use.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Ongoing.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Bulk Solids	Solid	22 tons	NA	re-use	NA

2.2 Planning Section

2.2.1 Anticipated Activities

T&D of waste
Drain pcb contaminated transformers and transformers located on the bank of the Mahoning River. upon USCG approval, arrange for transformer draining under FPN E18519

2.2.1.1 Planned Response Activities

Disposal activities are expected to begin the week of July 15, 2018

2.2.1.2 Next Steps

2.2.2 Issues

2.3 Logistics Section

ERRS provided all logistics for the site

2.4 Finance Section

2.4.1 Narrative

EPA Branch Chief verbally authorized a \$50,000 ceiling for the Emergency Response phase.

An Action Memo was signed on February 2, 2018 for the time critical removal action with a ceiling limit of

\$1,878,830 for removal actions. A delivery order was issued to ERRS for \$300,000 to begin response actions.

On May 22 the ERRS Ceiling was increased to \$425,000.

On July 11 the START ceiling was increased to \$43,850

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$425,000.00	\$283,000.00	\$142,000.00	33.41%
TAT/START	\$43,850.00	\$20,000.00	\$23,850.00	54.39%
Intramural Costs				
Total Site Costs	\$468,850.00	\$303,000.00	\$165,850.00	35.37%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

Safety briefings are held before the start of every workday and at the end of the work day.

High air monitoring readings were recorded during HCL bulking. activities were moved outside to provide more ventilation and air monitoring readings were within acceptable levels.

2.5.2 Liaison Officer

OSC Steve Wolfe

2.5.3 Information Officer

OSC Steve Wolfe

3. Participating Entities

3.1 Unified Command

OSC Steve Wolfe

3.2 Cooperating Agencies

OSC Steve Wolfe

4. Personnel On Site

1 EPA
1 START
5 ERRS

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report
response.epa.gov/WSH

6.2 Reporting Schedule

7. Situational Reference Materials

NCP and CERCLA.